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**Attorneys for Defendant
CMG MORTGAGE, INC. D/B/A CMG FINANCIAL**

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JEFFREY K. ENGLER and KATHERINE M.
SENNES-ENGLER.

Plaintiff~~s~~.

v.

**CMG MORTGAGE, INC. D/B/A CMG
FINANCIAL**

Defendant.

Case No. 2:19-cv-00869-GMN-BNW

**[PROPOSED] STIPULATION AND
ORDER TO EXTEND DISCOVERY**

[FIRST REQUEST]

Pursuant to Fed. R. Civ. P. 26(f), and Local Rule 26-1, Plaintiffs Jeffrey K. Engler and Katherine M. Sennes-Engler (“Plaintiffs”) and CMG Mortgage Inc. d/b/a CMG Financial (“CMG”) (collectively the “Parties”), by and through their attorneys, hereby stipulate to extend discovery deadlines and other deadlines in the September 9, 2019 Scheduling Order as follows:

1. Completed Discovery.

The parties have exchanged initial and supplemental disclosures. Plaintiffs propounded written Interrogatories, Request for Admissions and Request for Documents (“Plaintiffs’ Written Discovery Requests”) to Defendant. Defendant has responded to Plaintiffs’ Written Discovery

1 Requests and produced documents. CMG's 30(b)(6) deposition has been noticed and the parties
2 intend to proceed with deposition if this action is not settled.

3 **2. Remaining Discovery.**

4 Written discovery responses and at least one deposition.

5 **3. Good Cause.**

6 The parties have been diligently litigating this case and are requesting this extension for
7 good cause because CMG's 30(b)(6) deposition is currently set for November 18, 2019. Defense
8 counsel has requested this extension from Plaintiff's counsel due to a family death, causing defense
9 counsel to be unavailable from November 15th-November 22nd. Furthermore, Plaintiff has
10 proposed a settlement that involves CMG being required to, amongst other matters, modify
11 pending mortgage obligations. CMG is in the process of considering the parameters of such a
12 resolution.

13 This stipulation is made in good faith, is not interposed for delay, and is not filed for an
14 improper purpose. This is also the parties' first request for an extension.

15 **4. Current Discovery Deadlines.**

- 16 • Discovery Cutoff: **January 22, 2020**
- 17 • Amending Pleadings/Adding Parties: **October 24, 2019**
- 18 • Initial Expert Disclosures and Interim Status Report: **November 25, 2019**
- 19 • Rebuttal Expert Disclosures: **December 23, 2019**
- 20 • Dispositive Motion deadline: **February 21, 2020**
- 21 • Joint Proposed Pretrial Order: **March 23, 2020**

22 **5. Proposed Discovery Deadlines.**

- 23 • Discovery Cutoff: **March 23, 2020**
- 24 • Amending Pleadings/Adding Parties: **December 24, 2019**
- 25 • Initial Expert Disclosures and Interim Status Report: **January 24, 2020**
- 26 • Rebuttal Expert Disclosures: **February 21, 2020**

- 1 • Dispositive Motion deadline: **April 21, 2020**
2 • Joint Proposed Pretrial Order: **May 21, 2020**

3 WHEREAS, no prejudice will occur to this Court or the Parties if granted, good cause
4 supports this request to extend discovery;

5 NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS
6 HEREBY STIPULATED AND AGREED, by and between the Parties as follows:

7 The September 9, 2019 Scheduling Order shall be amended as follows:

- 8 • Discovery Cutoff: **March 23, 2020**
9 • Amending Pleadings/Adding Parties: **December 24, 2019**
10 • Initial Expert Disclosures and Interim Status Report: **January 24, 2020**
11 • Rebuttal Expert Disclosures: **February 21, 2020**
12 • Dispositive Motion deadline: **April 21, 2020**
13 • Joint Proposed Pretrial Order: **May 21, 2020**

14 **IT IS SO STIPULATED.**

15 DATED: November 15, 2019

16 WOLFE & WYMAN LLP

17 DATED: November _____, 2019

18 HAINES & KRIEGER, LLC

19 By: /s/ Andrew A. Bao
20 ANDREW A. BAO, ESQ.
21 Nevada Bar No.: 10508
22 6757 Spencer Street
23 Las Vegas, NV 89119
24 Attorneys for Defendant
25 CMG MORTGAGE, INC. D/B/A CMG
26 FINANCIAL

27 By: /s/ Shawn W. Miller
28 SHAWN W. MILLER, ESQ.
29 Nevada Bar No.: 7825
30 8985 S. Eastern Ave., Suite 350
31 Henderson, NV 89123
32 Attorney for Plaintiffs
33 JEFFREY K. ENGLER AND KATHERINE M.
34 SENNES-ENGLER

ORDER GRANTING
STIPULATION TO EXTEND DISCOVERY

In consideration of the parties' stipulation and good cause showing, **IT IS ORDERED**
THAT the September 9, 2019 Scheduling Order shall be amended as follows:

- Discovery Cutoff: **March 23, 2020**
 - Amending Pleadings/Adding Parties: **December 24, 2019**
 - Initial Expert Disclosures and Interim Status Report: **January 24, 2020**
 - Rebuttal Expert Disclosures: **February 21, 2020**
 - Dispositive Motion deadline: **April 21, 2020**
 - Joint Proposed Pretrial Order: **May 21, 2020**

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

Dated: 11/18/2019



1

2 **CERTIFICATE OF MAILING**

3 On November 15, 2019, I served the foregoing **[PROPOSED] STIPULATION AND**
4 **ORDER TO EXTEND DISCOVERY [FIRST REQUEST]**, by the following means to the
5 persons as listed below:

6 a. EFC System (you must attach the "Notice of Electronic Filing," or list all
7 persons and addresses and attach additional paper if necessary):

8 DAVID H. KRIEGER, ESQ. dkrieger@hainesandkrieger.com
9 SHAWN W. MILLER, ESQ. smiller@hainesandkrieger.com
10 Attorneys for Plaintiffs

11 b. United States Mail, postage fully pre-paid (List persons and addresses).

12 Attach additional paper if necessary):

13 DAVID H. KRIEGER, ESQ.
14 SHAWN W. MILLER, ESQ.
15 Haines and Krieger, LLC
16 8985 S. Eastern Avenue, Suite 350
17 Henderson, NV 89123
18 Attorneys for Plaintiffs

19 _____
20 */s/ Jamie Soquena*
21 Jamie Soquena
22 An employee of Wolfe & Wyman LLP